

EXHIBIT B

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

**[PROPOSED] ORDER DEDESIGNATING CERTAIN DOCUMENTS
DESIGNATED AS CONFIDENTIAL BY ALBOURNE AMERICA LLC**

Upon the motion (ECF Number __, the “Motion”)¹ of Irving H. Picard, Esq. (the “Trustee”) as trustee for the substantively consolidated liquidation of Bernard L. Madoff Investment Securities LLC and the estate of Bernard L. Madoff, seeking entry of an order, pursuant to the Litigation Protective Order dated June 6, 2011 (ECF No. 4137), and the relevant sections of the United States Bankruptcy Code, 11 U.S.C. § et seq., and Federal Rules of Bankruptcy Procedure referred to therein, granting the Trustee’s Motion to Dedesignate Certain Documents Designated as Confidential by Albourne America LLC; and it appearing that due and sufficient notice has been provided to those parties indicated in the Motion as set forth in the affidavit of service thereof on file, and it appearing that the foregoing constitutes good and sufficient notice and that no other or further notice need be given; and it further

¹ All capitalized terms not otherwise defined herein shall have the meaning ascribed to them in the Motion.

appearing the relief sought in the Motion is appropriate based upon the record of the hearing held before this Court to consider the Motion; and after due deliberation; and sufficient cause appearing therefor;

NOW, THEREFORE, IT IS HEREBY ORDERED that,

1. The Motion is granted.
2. The Documents shall hereafter be considered non-confidential for all purposes related to the main adversary proceeding (No. 08-01789) and all related adversary proceedings.
3. Albourne shall re-produce to the Trustee each of the Documents, removing any “confidential” branding and otherwise in accordance with any other protocols established by the Trustee for the re-production of dedesignated documents.
4. This Court retains jurisdiction with respect to all matters arising from, or related to, the implementation of this Order.

So Ordered this ___ day of _____, 2015.

HONORABLE STUART M. BERNSTEIN
UNITED STATES BANKRUPTCY JUDGE